



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Dame Amanda Milling DBE, former Lords Commissioner to the Treasury. Paid appointment with SW1 Media Ltd.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as Consultant with SW1 Media Ltd, which trades as Millbank Global.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer Millbank Global. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment – it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risks presented

5. Millbank Global is a political and public sector communications firm. It provides services in videography, photography, graphic design, and digital branded content to allow better communication from public bodies to its audiences. In

your role as a Consultant, you said that you will be helping to develop and grow the business.

6. You did not meet with Millbank Global, nor did you make any decisions in your recent ministerial role that were specific to the company. The Committee¹ considered the risk that you were offered this role as a reward for decisions or actions taken in post was low.
7. As a former minister, there are inherent risks associated with your general access to privileged information, contacts, and influence within government. The risks are limited given there is no direct overlap between your responsibilities in government and your proposed role.
8. The unknown nature of Millbank Global's clients means that it is difficult to determine the precise work you will undertake. As a former minister, you were likely privy to a breadth of information and may have stepped into some issues in depth. Therefore, there is a risk you may be asked to advise on matters that have overlap with your responsibilities in office, or with companies you had specific involvement with in office. This could raise real and perceived risks of you offering an unfair advantage to Millbank Global.
9. You told the Committee that your role will focus on business development. This raises a potential risk that you could offer an unfair advantage to Millbank Global by drawing on your contacts outside of government that you may have gained in your ministerial role.
10. The Committee noted there is a risk associated with a former minister joining an organisation that may lobby the government, particularly in light of the lobbying ban that applies to all former ministers for two years on leaving office. It is relevant in mitigating this risk that Millbank Global has confirmed your description of this role as having no involvement in lobbying.

The Committee's advice

11. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of Millbank Global. Alongside the standard conditions, to mitigate the risk associated with unknown clients, the

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir. Dawid Konotey-Ahulu CBE DL was unavailable.

Committee has imposed a restriction to prevent you from advising on work specifically overlapping with your recent ministerial role.

12. When considering the risks in this case, the Committee considered it significant that Millbank Global confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules.
13. Additionally, the Committee imposed a restriction on lobbying contacts you made during your time in office in other governments and organisations outside of the UK government for the purpose of securing business for Millbank Global.
14. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **SW1 Media Ltd / Millbank Global** be subject to the following conditions:
 - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of SW1 Media Ltd / Millbank Global (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage SW1 Media Ltd / Millbank Global (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with SW1 Media Ltd / Millbank Global (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with regard to the subject matter of a bid with, or contract relating directly to the work of, the UK government or its arm's length bodies;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office in external governments and organisations for the purpose of securing business for SW1 Media Ltd / Millbank Global; and
 - for two years from your last day in Crown service, you should not advise Millbank Global or its clients on any work with regard to any policy which you had a material role in developing or determining as Lords Commissioner to the Treasury or where you had a relationship with the company or organisation

during your time in this role.

15. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests.² It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
16. By 'privileged information' we mean official information to which a minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Ministerial Code or otherwise.
17. The Business Appointment Rules explain that the restriction on lobbying means that you "should not engage in communication with government (ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place – with a view to influencing a government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office".
18. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
19. Once the appointment(s) has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Pickles

² All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

Annex - Material Information

The role

1. According to its website, Millbank Global is a strategic communications consultancy, specialising in public affairs, crisis comms and reputation management. As an agency, it provides videography, photography, graphic design and digital branded content, with a number of clients including elected officials, government agencies and third sector organisations. Their services include: photography, film & video, brand & design, digital strategy, research & insights and campaigns.
2. In your role as Consultant, you said that you will be helping to develop and grow the business. You confirmed your role will not involve contact with or lobbying of government.
3. The Committee contacted Millbank Global which confirmed your role will not involve lobbying government. It stated:

'...we have no interest in, nor would we seek influence over, Government policy of any sort, whether current or past. Our only relationship with Government is that of a contractual nature, us being the supplier, and in any case our Non- Executive Directors do not have any role in discussions for, negotiations over or the procurement of, those contracts.'

It also added that:

'Dame Amanda will not be involved in lobbying of any sort for SW1 Media Limited, nor shall she be involved in contractual discussions with any Government department, either now or in the foreseeable future, but certainly not for the remainder of the period of 2 years following Dame Amanda's departure from Government.'

Dealings in office

4. You advised the Committee that you did not meet with Millbank Global whilst in office. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental Assessment

5. The Cabinet Office confirmed the details you provided and recommended the standard conditions.